IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KEVIN FOOTE (aka Kevin Kelly), Individually and on behalf of all others similarly situated; *et al.*,

Plaintiffs,

v.

ALL ELITE WRESTLING, LLC; et al.,

Defendants.

Civil Action No. 2:24-cv-05351

Hon. Mia Roberts Perez, U.S.D.J.

STIPULATED [PROPOSED] ORDER EXTENDING PAGE LIMITS

Plaintiffs Kevin Foote, Brandon Tate, and Brent Tate and Defendants All Elite Wrestling LLC, Ian Riccaboni, and Tony Khan hereby stipulate and agree as follows:

- 1. Pursuant to Fed. R. Civ. P. 81(c)(2), Defendants' response to Plaintiffs' Complaint is due on or before October 11, 2024.
- 2. Defendants intend to respond to Plaintiffs' Complaint with an omnibus motion to dismiss for improper venue, to transfer venue in the alternative, or to compel arbitration in the alternative. Rather than pursue the various forms of relief sought through separate motions, Defendants intend to present these issues together for the sake of efficiency and the Court's convenience.
- 3. While Section III.A of the Court's Policies and Procedures limits motion briefs to twenty pages, in light of the number of legal issues addressed in Defendants' motion, the Parties agree that the page limits for both Defendants' supporting brief and Plaintiffs' opposition brief should be extended to thirty pages.

- 4. The Parties respectfully submit that the proposed extension promotes judicial efficiency, that the extension promotes the conservation of judicial and party resources, that good cause exists to grant the extension, and that no formal motion is required.
- 5. For these reasons, the Parties respectfully request that the Court enter this Stipulation as an Order.

Dated: October 10, 2024

Respectfully submitted,

INJURY LAW PARTNERS

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*admitted *pro hac vice*

	SO ORDERED.
Dated:	
	Hon. Mia Roberts Perez
	United States District Judge